



Mr Mathieu Grosch
European Parliament
Rue Wiertz, 60
1047 Brussels

12 March 2010

Dear Mr Grosch,

Following your intervention at BUSINESSEUROPE's transport working group we would like to submit the following comments on the draft own-initiative report on "A Sustainable Future for Transport, for which you are rapporteur. We would first like to reiterate that we welcome this initiative and support the general direction the report has taken.

BUSINESSEUROPE is delighted with the attention given to the completion of the internal market for transport and the acknowledgment of the role played by transport in the European economy. A well-functioning transport system, with competition and a level playing field between modes of transport, is needed for free flows of goods and passengers, which are essential in securing a well-functioning internal market. Furthermore, we support the principle of co-modality and the balanced approach taken in the draft report. Adequate infrastructures with intermodal links provide a better exploitation of the strengths of each mode, which can contribute significantly to reducing congestion, emissions, pollution and accidents. In addition we welcome the promotion of tools such as public-private partnerships and the attention given to the financing of infrastructure.

Still, we take this opportunity to highlight some areas where we believe the report could be improved. BUSINESSEUROPE supports the inclusion of targets in the report, but the selection of these targets should be based on efficiency criteria. The balanced and holistic approach of the report is not completely reflected in the targets which only concern social and environmental aspects. Economic objectives and competitiveness should also be targeted. These targets could include for instance a deadline for the creation of the European Transport Area or identify specific bottlenecks that should be removed. In context of the TEN-T, there should be a deadline for the completion of core projects, the adoption of a common standards and the reduction of congestion in the major axes of the EU transport system.

Also with regard to the targets we question the use of the same reduction targets for all modes and sectors. Instead we strongly support a cost effective approach, irrespective of sector or mode, for achieving the overall objective. For the transport sector we refer to the still ongoing fact-finding study 'EU Transport GHG, roads to 2050?'. To achieve



efficiency, impact assessments of all targets and measures should be promoted. We are for instance puzzled by the target of reducing the electricity used by rail vehicles while rail vehicles which still run on diesel are not addressed.

The choice of 2010 as reference year means that, in case of an economic recovery, the achievement of the reduction targets require in fact a reduction well in excess of the 20 percent mentioned in terms of performance improvements, the feasibility of which is highly questionable. Targets must be underpinned by more specific means than "suitable innovations" and targets for vehicle and fuel efficiency improvements should be realistic. Furthermore, some targets do not address possible measures at all.

To conclude, we want to express again our support for the general direction of the draft report. It is our view that the further development of sustainable transport requires a blend of initiatives to work in combination with each other relating to infrastructure, modes, transport vehicles and equipment, ICT solutions, network services, and operational and administrative procedures. We strongly believe that a condition for success is ongoing cooperation between EU institutions and industry.

We hope that the concrete suggestions for improvements to the Parliament's own-initiative report are helpful and constructive for the development of the report.

We would be happy to continue our discussions on this in the future.

Yours sincerely,

Jérôme Chauvin
Director
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Internal Market Department